

AO 91 (Rev. 11/11) Criminal Complaint

FILED**UNITED STATES DISTRICT COURT**

for the

AUG 21 2020

Western District of Texas

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature]
DEPUTY CLERK

United States of America)

v.)

CHRISTIAN OCHOA)
ESTEBAN OCHOA-RODRIGUEZ)
LUIS VICTORINO-MARES)Case No. DR-20-1493M-01,02,03Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 19, 2020 in the county of Uvalde in the
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 USC 1324 (a)(1)(A)(v)(I) & (B)(i)	Conspiracy to Transport Illegal Aliens: Did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered and remained in the United States in violation of law.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.[Signature]
*Complainant's signature*Erick R. Domenech, HSI Task Force Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 08/21/2020[Signature]*Judge's signature*City and state: Del Rio, TexasVictor Garcia, US Magistrate Judge*Printed name and title*

Attachment A

On August 19, 2020, Units consisting of the Del Rio Sector Intelligence Unit (DRT-SIU), DRT Special Operations Detachment (SOD), Uvalde Station (UVA) and Homeland Security Investigations (HSI) - Del Rio executed a Federal Search Warrant on the Davenport Ranch, near Uvalde, Texas, as part of Operation Apple Jack.

The execution of a Federal Search Warrant issued by Federal Judge within the Western District of Texas resulted in the arrest of one Legal Alien Permanent Resident (LAPR) and seven Illegal Aliens, 2 from Mexico, 2 Guatemalans, 2 Dominicans and 1 Honduran. Christian OCHOA (DOB: 08-22-1988 / COC: MX / LAPR) and the two undocumented aliens from Mexico were arrested and suspected of being involved of facilitating alien smuggling. The two undocumented aliens from Mexico were identified as Esteban OCHOA-Rodriguez (DOB: 02-29-1960 / COC: MX) and Luis VICTORINO-Mares DOB: 08-31-1976 / COC: MX).

During post Miranda interview Christian OCHOA revealed that he was hired by an individual in Mexico in order to facilitate the smuggling of illegal aliens into the United States. Ochoa stated that he has been facilitating smuggling ventures for approximately one year. OCHOA stated that he would harbor illegal aliens at his residence and later transport them through the Davenport Ranch and neighboring ranches in order to circumvent the immigration checkpoint located on Highway 90 West of Uvalde, TX.

OCHOA stated having participated in approximately sixty smuggling ventures averaging six illegal aliens per attempt. OCHOA provided detailed information regarding the smuggling ventures. Furthermore, OCHOA admitted paying Esteban OCHOA-Rodriguez \$500.00 USD every two weeks as payment for his participation as a caretaker of the undocumented aliens being transported and dropped off at the Davenport Ranch.

OCHOA identified Luis VICTORINO-Mares as a load driver that would frequently transport illegal aliens from the Mexico/US border to the Davenport Ranch. OCHOA stated that three of the illegal aliens arrested were transported by VICTORINO.